

**EXHIBIT B**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**ORDER GRANTING THE TRUSTEE'S APPLICATION TO RETAIN  
TAN KOK QUAN PARTNERSHIP AS SPECIAL COUNSEL  
RETROACTIVE TO JANUARY 13, 2023**

Upon the Application of Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, and the Chapter 7 estate of Bernard L. Madoff, for authority to retain Tan Kok Quan Partnership ("TKQP") as special counsel, retroactive to January 13, 2023, and upon the declaration of Mr. Eddee Ng submitted in connection therewith, and due and proper notice having been given under the circumstances of this case, and after due deliberation,

**IT IS HEREBY ORDERED THAT:**

1. The Application is **GRANTED**.
2. The Court finds that TKQP is deemed disinterested under 15 U.S.C. § 78eee(b)(6).

3. The Trustee is authorized to retain TKQP as special counsel to the Trustee as provided in the Application, retroactive to January 13, 2023.